

UNITED STATES BANKRUPTCY  
COURT DISTRICT OF NEW  
JERSEY

**FEE APPLICATION COVER SHEET FOR THE PERIOD**  
**JUNE 1, 2023 THROUGH JUNE 30, 2023**

Debtor: LTU Management LLC Applicant: Molo Lamken LLP  
Case No.: 23-12825 (MBK) Client: Official Comm. of Talc  
Chapter: 11 Case Filed: April 4, 2023

**SECTION I**  
**FEE SUMMARY**

☒ Monthly Fee Application No. 3 or ☐ Interim Fee Application No.     or ☐ Final Fee Application

Summary of Amounts Requested for the Period from June 1, 2023 through June 30, 2023

Total Fees: \$101,730.00  
Total Disbursements: \$0.00  
Minus 20% holdback of Fees: \$20,346.00  
**Total Amount Sought To Be Paid at this Time: \$81,384.00**

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE <sup>1</sup>	FEE
1. Jeffrey A. Lamken	Partner 1991	22.5	\$1,750	\$39,375.00
2. Rayiner I. Hashem	Partner 2015	49.9	\$975	\$48,652.50
3. Nathaniel Rubin	Associate 2019	15.4	\$775	\$11,935.00
4. Catherine Martinez	Associate 2020	1.9	\$775	\$1,472.50
5. Natalie Fay	Paralegal	1.0	\$295	\$295.00
<b>TOTALS</b>		<b>90.7</b>		<b>\$101,730.00</b>

Fee Totals: \$101,730.00  
Disbursements Totals: \$0.00  
Total Fee Application: \$101,730.00

<sup>1</sup> Rates in this statement reflect the rates disclosed in MoloLamken's Retention Application [Dkt. 542].

## SECTION II

## SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.	0.0	\$0.00
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	9.4	\$7,965.00
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.	0.0	\$0.00
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	81.3	\$93,765.00
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and creditors' committee meetings.	0.0	\$0.00
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) <b>Valuation</b> Appraise or review appraisals of assets.	0.0	\$0.00
w) <b>Travel Time (billed @ 50%)</b>	0.0	\$0.00
x) <b>Committee Governance Matters</b> Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters.	0.0	\$0.00
y) <b>Investigation and Due Diligence</b> Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) <b>Hearings</b> Preparation for and attendance at hearings.	0.0	\$0.00
aa) <b>Mediation</b> Preparation for and attendance at mediation.	0.0	\$0.00
<b>SERVICE TOTALS:</b>	<b>90.7</b>	<b>\$101,730.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing Fees</b> Payable to Clerk of Court.	\$0.00
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$0.00
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	\$0.00
d) <b>Fax</b> Include per page fee charged.	\$0.00
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges. Court-Solutions	\$0.00
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	\$0.00
g) <b>Outside Reproduction Services</b> Including printing & scanning services. This includes trial preparation.	\$0.00
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) <b>Court Reporting</b> Transcripts.	\$0.00
j) <b>Travel</b> Mileage, tolls, airfare, rail fare, parking.	\$0.00
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	\$0.00
l) <b>Postage</b>	\$0.00
m) <b>Other (specify) Professional Services BRI LLC</b> In-House Investigative Services.	\$0.00
n) <b>Other (specify) Trial Expenses</b>	\$0.00
o) <b>Other (specify) Professional Services</b>	\$0.00
p) <b>Other (specify) Deposition Services</b> Paszkievich Court Reporting	\$0.00
q) <b>Other (specify) Meals</b>	\$0.00
r) <b>Other (specify) eDiscovery Hosting</b> In-House eDiscovery platform.	\$0.00
<b>DISBURSEMENTS TOTAL:</b>	<b>\$0.00</b>

I certify under penalty of perjury that the above is true.

Date: July 31, 2023

/s/ Jeffrey A. Lamken

MoloLamken LLP (“MoloLamken”) submits this Third Monthly Fee Statement of MoloLamken LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Appellate Litigation Counsel for The Official Committee of Talc Claimants for the Period from June 1, 2023 through June 30, 2023 (“Third Monthly Fee Statement”), pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the “Interim Compensation Order”). The invoice summary and time entries are attached as “Exhibit A” and the time entries broken out by task is attached as “Exhibit B.”<sup>2</sup>

WHEREFORE, MoloLamken respectfully requests payment of fees and expenses for the Third Monthly Fee Statement in the sum of \$101,730.00, in accordance with the terms of the Interim Compensation Order.

Dated: July 31, 2023

**MOLOLAMKEN LLP**

*Special Appellate Litigation Counsel to the Official  
Committee of Talc Claimants*

By: /s/ Jeffrey A. Lamken  
Jeffrey A. Lamken

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<sup>2</sup> B160 corresponds to time spent preparing fee and employment applications. L240 corresponds to time spent on litigation relating to the Committee’s motion to dismiss the Debtor’s petition.